RIVERSIDE AVENUE SITE
29 RIVERSIDE AVENUE
NEWARK, NEW JERSEY
WORK PLAN

Prepared For:

US EPA Region II
28890 Woodbridge Avenue,
Edison, New Jersey 08837

Contract No. EP S2 -10-01
Task Order No. 0038

Prepared By

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1.0 INTRODUCTION AND BACKGROUND

KEMRON Environmental Services, Inc. (KEMRON) is a Prime Contractor for the U.S. E.P.A. Region II and has been issued Task Order 38, under contract number EP-S2-10-01,for the Riverside Avenue Superfund Removal Site, located at 29-75 Riverside Avenue, Newark New Jersey. On 11/06/09, EPA Region II initiated an emergency response action at an abandoned industrial facility on the bank of the Passaic River in Newark, NJ.

The Site consists of 2 multi-story masonry-over-steel buildings and contains abandoned ASTs and USTs, one of which had discharged its contents into the Passaic River in 2009. The EPA Region II Director of ERRD verbally authorized $225K to activate ERRS to permanently cease the release into the river, which was temporarily being contained by NJDEP-ER and mitigate the discharge sources at the Site. Based on subsequent extensive sampling and analysis of chemicals found at the Site a decision was made in late January, 2011 to restart removal activities and initiate a time-critical removal action to complete the needed response activities.

This Work Plan is intended to address general Site conditions and scope-of-work to address the statement of work under the Task Order. This Work Plan is a dynamic document. It will be amended as needed during on-going removal operations as Site conditions demand.

1.1 SITE DESCRIPTION

The Riverside Avenue Site is an abandoned industrial facility in Newark, NJ on the banks of the Passaic River. Since the early 1900s the Site had been used for many businesses, including a paint manufacturer, a packaging company, and a chemical warehouse. It consists of two abandoned buildings on approximately two acres. The property is owned by the City of Newark and was acquired in tax foreclosure proceedings.

1.1.2.1 Location

29 Riverside Avenue, Newark, Essex County, New Jersey, between the Passaic River and (State Highway 21) McCarter Highway .

1.1.2.2 Description of Threat

Ten abandoned 12,000-15,000 gallon USTs containing hazardous wastes have been identified in a buried tank field on the property. Approximately 100 3,000 - 10,000 gallon ASTs have been identified in the buildings, many of which have been sampled for hazardous materials. Two tanks containing oily wastes have been located in the basement of one of the buildings. A number of 55-gallon drums and smaller containers have been observed in the buildings. In addition, there are a number of sumps that may contain hazardous substances. Some overhead piping containing asbestos insulation has been located and will be mitigated to protect workers passing through the area.

Other areas of the Site contain process piping and machinery which contains, or is contaminated with chemical residue. These items will be power-washed and the contents bulked for disposal.

2.0 PRECONSTRUCTION ACTIVITIES

Pre-mobilization activities include the initial Site walk-thru and preliminary planning for set up. This includes locating areas for setting up removal operation support facilities, locating and mapping of the Contamination Reduction Zone, (CRZ), and set up locations for a security guard and crew break trailer. These activities also include the procurements for Armed Security Services, Laboratory Analytical Services, and rentals of Operational Support Facilities, and procurement for transportation and disposal of construction and vegetative debris from clearing and grubbing operations.

3.0 MOBILIZATION AND SITE PREPARATION

Mobilization of personnel, equipment, materials, and subcontractor services assigned to the project will occur continuously throughout the project dependent on the removal action schedule. Initially Kemron will mobilize: 1 Response Manager, 1 Field Cost Administrator, 3 Technicians, and 1 Foreman, 3 pick up trucks, 1 uni-loader with bucket and forks, 1 -30 yard roll off, 1 crew trailer, 1 office trailer, 1 -25 kw Generator, 1 Conex storage container.

3.1 SITE PREPARATION

Site preparation activities will include installation of the support trailers, sanitary facilities, and equipment and material staging areas. Project Site setup and preparation will consist of the following main activities:

- Clearing and grubbing of the exterior areas around the two buildings
- Installation of support trailers
- Securing of the buildings doorways and windows to prevent unauthorized persons from entering the hot zone areas
- Construction of a CRZ/ Decontamination area for personnel
- Security Guard services onsite during non-working hours

3.1.1 TEMPORARY FACILITIES INSTALLATION

Temporary office trailers will be installed at the Site and power will be obtained through a 25 kw generator until electrical service is established from the local power utility.

The Site entry/exit logs for all personnel, including subcontractors and visitors, will be maintained at this location. Temporary restroom facilities ("port-o-lets") will also be situated and maintained in this area.

3.1.2 SITE UNDERGROUND UTILITIES LOCATING

Kemron will initiate underground utility locating services for the Site prior to starting any Underground Storage Tank operations or any other subsurface work at the project site.

3.1.3 SITE SECURITY

KEMRON will be responsible for monitoring and controlling site access of all KEMRON personnel, subcontractors and vendors that are associated with the remediation work, and those who enter the established work areas and or control zones.

Individuals desiring access to a restricted area and who do not meet the training and medical surveillance requirements for entry into such an area as specified by the SSHASP and CFR1910.120 shall be denied access beyond the office trailers.

The KEMRON Site Safety Officer (SSO) will determine when and if an unqualified person can enter a restricted area. The following individuals, due to their direct or indirect involvement with the project, may require access into a work zone.

- KEMRON Personnel
- Subcontractor Personnel
- EPA Personnel
- Project support personnel, truck drivers, public utility workers, and emergency workers.

All visitors to the site must check in at the site command post and review the Site HASP and obtain clearance to enter restricted access work areas.

4.0 REMOVAL ACTIONS

The Removal Action at the Riverside Avenue Site consists of but is not limited to the general tasks listed below. Actual removal operations may change as Site conditions and or client needs dictate changes to this generic plan.

Building #7:

Building 7 is a 3-story building with a basement. This building has multiple tanks containing chemicals. The building also has piping with asbestos containing material (ACM). The presence of ACM has the potential for human exposure to workers and will require securing and/or removal as situations and the client dictate. The following is general outline of task to address the removal actions for Building 7. Work within this structure will be completed in Level "C" protection at a minimum, and all work will be performed in levels of protection that are outlined in the Site HASP. Any entry into confined space areas and or tanks will be performed in Level "B" protection.

- Debris removal on the ground floor level is required to obtain clear and safe access into the building. The debris material will be loaded into the C&D roll off and other items such as tires and or pallets will be staged in a separate area outside under a covered area beside building 7.
- Covering of all open holes and pits that lead to the basement within the building will be achieved with steel plates.
- Cover insulated piping with poly sheeting and duct tape to reduce the potential for ACM releases in work areas by work crews.
- Secure existing doors or construct wooden walls to cover open elevator shafts.
- Skylights on the roof will be covered with plywood to reduce the effects of weather into the tanks room work areas.
- Installation of temporary string lighting in work areas of building 7 on all 3 upper floors.
- Floor cleanup of mud, paint chips, and other materials via shovels and HEPA vacuum operations. These materials can be packaged in lined cubic yard boxes. These materials will be sampled and analyzed for ACM, and other contaminants of concern as directed by EPA. This includes all floor areas and stairwells in building 7.
- Basement area: This area currently has approximately 4 to 5 feet of water and floating material. This will be sampled and analyzed for hazardous characteristics or material to determine how this fluid will be treated and or removed from the building to gain access to the basement area. The basement will then be evaluated by EPA and Kemron to determine what additional actions are necessary to address process lines and or storage vessels of hazardous materials in this area.
- A tank/vessel inventory and sampling operation will be initiated to address the 100's of tanks on floors 2 and 3 of building 7.
- Process line will be evaluated and drained of any free-flowing product materials. Materials that have become dried or hardened and or viscous will be evaluated and a removal methodology determined at the time of the material being encountered.

- Tank cutting for cleanout access will be achieved by using pneumatic tank nibblers to cut sufficient access ways into tanks and or vessels. LEL checks and additional air monitoring will be continuously ongoing during all tank and line breaking operations. The threats of explosions are reduced through the use of pneumatic tools, inerting of tanks with Nitrogen, Carbon Dioxide or other non flammable/non combustible gases. Air monitoring with an LEL/O2 meter will ensure that the use of the inerting methodologies is effectively working to reduce and eliminate the threat of a explosion or fire.

Building #12:

Building 12 is a 5-story building with a basement. The interior stairwells are collapsing and are not suitable for use during removal operations. The exterior fire escape stairs will be used for access/egress to the upper floors of the Building. All work in the upper floors will conducted in Level "C" PPE. The upper floor of the building has pigment hoppers remaining with material in the hoppers. The floors are coated with pigment and will be HEPA Vacuumed to remove the pigment material.

The basement of Building 12 is currently not accessible due to the collapsed staircase. Previous work reports from the site indicate that there are several tanks in the basement of this building that contain solvents and or other materials. This area will be accessed by installation of temporary stairs and a plan will be developed for any further actions in this area.

Underground Storage Tanks

The underground storage tank farm is located north of and adjacent to Building 12. The farm is believed to contain ten 10,000 - 15,000 gallon storage tanks, most of which contain chemicals.

The following is a list of tasks for addressing the UST tank farm:

- Soil staging area construction on the opposite side of Building 12 by installing silt fence and poly for staging of removed soils, All soil piles will be covered daily and secured to reduce and prevent runoff of potentially contaminated materials
- Underground utility locating before excavation
- Excavate the tank farm areas to expose tanks for sampling of contents
- Sample tanks and analyze for transportation and disposal parameters
- Procurements for T&D of contents to RCRA approved waste processing/disposal facility.
- Bulk removal and transport of tank contents
- Tank removal and cleaning
- Contaminated soils removal as directed by EPA OSC
- Backfilling of excavated tank farm area and compaction of the backfill in 8" lifts
- Restore gravel lot UST-Tank farm area as directed by EPA OSC

4.1 DOCUMENTATION

Documentation required under this contract consists of but not limited to:

- RCMS Daily cost tracking reports.
- Daily Progress Reports.
- Monthly status reports
- Offsite Disposal reports.
- Inventory and sampling data reports.